



Peter D. Raymond
Partner

212 909-9675 DIR TEL
212 909-9463 DIR FAX
praymond@wmlp.com

WACHTEL MISSRY

WWW.WMLLP.COM

One Dag Hammar skjold
885 SECOND AVENUE
NEW YORK NY 10017
MAIN TEL 212 909-9500
FACSIMILE 212 371-0320

July 17, 2025

By ECF

Hon. Claire C. Cecchi, U.S.D.J.
United States District Court
for the District of New Jersey
50 Walnut Street
Newark, New Jersey 07102

Re: *Industria de Alimentos Zenú S.A.S. v. Latinfood U.S. Corp. d/b/a Zenú Prods. Co., et al.*, Civil Action No. 2:16-cv-6576-CCC-MAH

Dear Judge Cecchi:

We represent Plaintiff Industria de Alimentos Zenu S.A.S. (“Industria” or “Plaintiff”) in the above captioned action against Latinfood U.S. Corp. and Wilson Zuluaga (together, “Latinfood” or “Defendants”). We write in reply to Mr. Ingber’s July 11, 2025 responding letter, ECF No. 378, to our request for a court conference.

As set forth in our letter to the Court dated March 3, 2025, ECF No., 376, Plaintiff complied with the sole condition set by Judge McNulty for lifting the stay of his injunction by filing its Colombian trademark registrations for its ZENU and RANCHERA trademarks on August 10, 2023, ECF No. 316, and Latinfood submitted its permitted response by its filing with the Court on August 24, 2023. ECF No. 319.

The purported “expert report” which Latinfood has attached to its correspondence with the Court, is a red herring which was never authorized by the Court and far post-dates the August 2023 deadline for Latinfood’s responsive filing under Judge McNulty’s order, or the November 2023 deadline for expert reports. Therefore, both the report and Mr. Ingber’s request for a “briefing schedule” regarding the report should be disregarded by the Court. It is a completely improper and unauthorized attempt to further delay the injunction which Judge McNulty entered in June of 2023.

The stay of the June 2023 injunction should be lifted so that Latinfood will be compelled to stop its willfully infringing sales of products using Plaintiff’s valuable trademarks.

We thank the Court for its consideration of these matters.

Respectfully Submitted,
/s/Peter D. Raymond

Cc: all counsel via ECF